



Gregory E. Ostfeld
Tel 312.456.8400
ostfeldg@gtlaw.com

November 3, 2022

Via ECF

Hon. Robert B. Kugler
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation, United States District Court for the District of New Jersey; Case No.: 1:19-md-2875*

Dear Judge Kugler:

Pursuant to the Court's directive at the October 27, 2022 Case Management Conference, the parties have met and conferred to discuss a proposed schedule for damages experts in connection with the trial of the claims of third-party payor Plaintiff MSP Recovery Claims Series, LLC ("MSPRC") against the manufacturer defendants ZHP, Teva, and Torrent (the "TPP Trial Defendants").

The parties have agreed on the following proposed schedule:¹

January 20, 2023	MSPRC to serve damages expert report(s)
March 10, 2023	TPP Trial Defendants to serve damages expert report(s)
April 10, 2023	Deadline to complete damages expert depositions
April 17, 2023	Deadline for Rule 702/ <i>Daubert</i> motions on damages experts
May 8, 2023	Deadline for responsive briefs on Rule 702/ <i>Daubert</i> motions on damages experts
May 22, 2023	Deadline for reply briefs on Rule 702/ <i>Daubert</i> motions on damages experts

¹ Plaintiffs reserve their right to seek leave to file rebuttal report(s), if necessary, to Defendants' damages experts. The TPP Trial Defendants contend rebuttal reports for damages experts are not necessary.

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The parties jointly request that the Court enter an order setting the agreed deadlines above for damages experts for the TPP trial. Concurrent with this letter, the parties also submit a proposed order.

Respectfully submitted,

s/ Gregory E. Ostfeld
GREENBERG TRAURIG, LLP
Gregory E. Ostfeld
77 West Wacker Drive, Suite 3100
Chicago, Illinois 60601
Tel: (312) 456-8400
ostfeldg@gtlaw.com

*Attorneys for Teva Pharmaceuticals
USA, Inc., Teva Pharmaceutical
Industries Ltd., Actavis LLC, and
Actavis Pharma, Inc.*

cc: All counsel of record (via ECF)